

EXHIBIT 17

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 In re:

5 PG&E CORPORATION

6 - and -

7 PACIFIC GAS AND ELECTRIC
8 COMPANY,

9 Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF CINDY WILSON
REGARDING WILLIAM B. ABRAMS
MOTION TO DESIGNATE
IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §1125(B) AND
1126(E) AND BANKRUPTCY RULE 2019**

- 10 ☐ Affects PG&E Corporation
11 ☐ Affects Pacific Gas and Electric Company
12 ☒ Affects both Debtors

13 ** All papers shall be filed in the Lead Case,
14 No. 19-30088 (DM).*

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 6799, 6964, 6963

15 **DECLARATION OF CINDY WILSON**

16 Cindy Wilson declares the following pursuant to 28 U.S.C. § 1746:

17 1. I am the paralegal in charge of WATTS GUERRA's California Fires cases, with
18 primary responsibility over the entirety of its California Fires project.

19 2. After each occasion when Mikal Watts communicates with our clients, either
20 through in-person client town hall meetings, either in Santa Rosa, California, or in Chico,
21 California, or through telephonic town hall meetings made necessary by the COVID-19 pandemic
22 and consequent sheltering-in-place orders, those meetings are videotaped at my direction, and
23 those videos are provided to me, and I have them transcribed by court reporters at the firm's
24 chosen court reporters at WORLDWIDE COURT REPORTERS, who then send those transcripts
25 back to me, which I then cause to be delivered to WATTS GUERRA's clients.
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1 3. Exhibit “A” hereto is a true and correct copy of an excerpt of Mikal Watts’
2 December 8, 2019 in-person town hall meeting conducted by Mikal Watts to our clients.

3 4. Exhibit “B” is a true and correct copy of the email we sent to our client base,
4 forwarding the video link and transcript of the December 8, 2019 in-person town hall meeting
5 conducted by Mikal Watts to our clients.
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7 5. Exhibit “C” is a true and correct copy of the transcript of the April 18, 2020
8 telephonic town hall meeting conducted by Mikal Watts.

9 6. Exhibit “D” is a true and correct copy of the transcript of the April 25, 2020
10 telephonic town hall meeting conducted by Mikal Watts.

11 7. Exhibit “E” is a true and correct copy of a May 1, 2020 client update letter sent by
12 Mikal Watts to our California Fires clients.
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14 8. Exhibit “F” is a true and correct copy of the transcript of the May 2, 2020
15 telephonic town hall meeting conducted by Mikal Watts.

16 9. Former WATTS GUERRA client Geoffrey Reed was sent Exhibit B on December
17 13, 2019, and WATTS GUERRA’s email system documents that he in fact opened it on that day,
18 thereby receiving the video link and transcript of the December 8, 2019 in-person town hall
19 meeting conducted by Mikal Watts to our clients. *See* Exhibit “G,” a true and correct copy of the
20 relevant field from WATTS GUERRA’s email system, documenting that he in fact opened the
21 email we sent to our client base, forwarding the video link and transcript of the December 8, 2019
22 in-person town hall meeting conducted by Mikal Watts to our clients.
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24 10. A search of the PrimeClerkPGE/Claims site has yielded over 100 claims filed on
25 behalf of financial institutions.
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11. These institutions include but are not limited to U.S. Bank, The Bank of New York, JPMorgan Chase Bank, Bank of America, Capital Bank and Trust, Citigroup Financial, Deutsche Bank National Trust Company, and Wells Fargo Bank.

12. These claims are valued from \$0.00 to \$350,382,602.74.

13. Exhibit “H” is a list of financial institutions with Proof of Claims filed with Prime Clerk.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 8th day of May, 2020.

/s/ Cindy Wilson
Cindy Wilson